

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

SHYANDREA AND MARY)	
HESTER, et al.,)	
)	
Plaintiffs,)	CIVIL ACTION NO.:
)	CV-06-572-WHA
v.)	
LOWNDES COUNTY COMMISSION,)	
CHRISTOPHER BROWN,)	
EMERGSTAT, DEPUTY JIMMY)	
HARRIS, et al.,)	
)	
Defendants.)	

JOINT MOTION TO EXTEND DISCOVERY

COMES NOW Tyrone Townsend, attorney for the Plaintiffs, and Celeste P. Holpp attorney for the Defendants, in the above styled case and moves this Honorable Court to extend the discovery deadlines in this proceeding and offers the following facts in support of said motion:

1. Discovery is still ongoing in this matter and will not be concluded by the passing of the original deadline date of April 17, 2007.
2. That Counsel for the Plaintiffs and counsel for the Defendants are in the process of scheduling depositions of the opposing parties and need additional time to achieve mutually acceptable dates and times for said depositions.
3. That the Defendants nor the Plaintiffs will be prejudiced by the granting of this motion by this Honorable Court.

Wherefore premises considered, the Plaintiffs pray that this Honorable Court will extend discovery for 30 days for the reasons stated above and in the interest of equity and justice. No oral argument is requested.

Respectfully submitted,

s/Celeste P. Holpp

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing document on all counsel of record by placing a copy of the same in the U.S. mail, postage prepaid and properly addressed on this the 6th day of April, 2007, as follows:

Celeste P. Holpp, Esq.
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Respectfully submitted,

s/Tyrone Townsend
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